



U.S. Department of Justice

United States Attorney
Southern District of New York

The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278

August 8, 2025

The Honorable Richard M. Berman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

The Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 1007

**Re: *United States v. Jeffrey Epstein,*
 19 Cr. 490 (RMB)
 United States v. Ghislaine Maxwell,
 20 Cr. 330 (PAE)**

Dear Judges Berman and Engelmayer:

The Government writes respectfully to respond to Judge Engelmayer's Order dated August 5, 2025, and Judge Berman's Order dated August 6, 2025.

In addition to seeking to unseal the grand jury transcripts, the Government moves to unseal the *Maxwell* and *Epstein* grand jury exhibits subject to appropriate redactions of victim-related and other personal identifying information. As there are parties whose names appear in the grand jury exhibits but did not appear in the grand jury transcripts, the Government is undertaking to notify such parties to the extent their names appear in grand jury exhibits that were not publicly admitted at the *Maxwell* trial (and they were not already notified in connection with the request to unseal the grand jury transcripts). The Government respectfully requests to update the Court following those notifications by August 14, 2025, and requests that the Court await that update before unsealing any of the grand jury exhibits, to the extent the Court is otherwise inclined to do so.

In conjunction with this letter, the Government will submit sealed, *ex parte* submissions clarifying which portions of the grand jury exhibits in the *Maxwell* and *Epstein* matters have been made public. In making this assessment, the Government has compared the grand jury exhibits against the trial record and exhibits in the *Maxwell* trial, as well as against any publicly filed civil complaints identified by the Government that were filed by certain victims, as explained in further detail in the Government's sealed, *ex parte* submissions.¹

¹ Many civil complaints were filed in federal and state courts on behalf of victims identified solely as "Jane Doe" or by initials that may or may not be the initials of the plaintiffs in those actions, and therefore the Government cannot attribute with certainty to whom the statements or allegations in those anonymized complaints can be attributed. If the Government identifies additional materials on public dockets that make such attribution possible, it promptly will notify the Court.

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The Government will also today submit to Judge Berman under seal and *ex parte* a version of the *Epstein* grand jury transcripts that specifically identifies which information in the transcripts is, as far as the Government is aware, publicly available. This approach is in line with that taken by the Government with respect to the *Maxwell* grand jury transcripts submitted to Judge Engelmayer on August 4, 2025 (20 Cr. 330, Dkt. 800).

As always, the Government is available to answer any questions the Court may have.

Respectfully submitted,

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/s/ Jay Clayton
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